PROPOSED STIPULATED PROTECTIVE ORDER

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TO: THE COURT, ALL PARTIES AND ALL COUNSEL OF RECORD: PLEASE TAKE NOTICE that Defendant hereby files this Notice of Lodging of Proposed Stipulated Protective Order regarding the previously filed Stipulated Protective Order, which is attached hereto as Exhibit 1. DATED: February 7, 2013 DORSEY & WHITNEY LLP By: /s/ Cherise S. Latortue Mandana Massoumi Cherise S. Latortue Attorneys for Defendant TARGET **CORPORATION** PROPOSED STIPULATED PROTECTIVE ORDER

[PROPOSED] ORDER Pursuant to the Stipulated Protective Order ("Joint Stipulation") filed by Plaintiff Thomas Chitwood and Defendant Target Corporation (collectively "the Parties"), filed with this Court on January 24, 2013, the Court rules as follows: IT IS HEREBY ORDERED that the Joint Stipulation is entered as an Order of the Court. IT IS SO ORDERED. Dated: February 20, 2013 Judge Jay C. Gandhi, Magistrate Judge of the United States District Court, Central District of California

CERTIFICATE OF SERVICE

I, Tracey A. Christofferson, hereby certify and declare as follows:

I am over the age of 18 years and not a party to this action. My business address is 600 Anton Boulevard, Suite 2000, Costa Mesa, California 92626. On February 7, 2013, I caused service of the following document(s) on counsel for all parties registered with the ECF System by electronically filing the document(s) with the Clerk of the District Court using its ECF System, which electronically notifies them. The document(s) served include: **NOTICE OF LODGING RE: PROTECTIVE ORDER**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of January, 2013, at Costa Mesa, California.

/s/ Tracey A. Christofferson
Tracey A. Christofferson